

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

TAPESTRY, INC.,

and

CAPRI HOLDINGS LIMITED,

Defendants.

Case No. 1:24-cv-03109-JLR

REDACTED VERSION

**DECLARATION OF ABBY L. DENNIS IN SUPPORT OF PLAINTIFF FEDERAL
TRADE COMMISSION'S MOTION FOR A PRELIMINARY INJUNCTION**

I, Abby L. Dennis, an attorney acting on behalf of the United States government, declare the following is true and correct under penalty of perjury.

1. I am an attorney for the Federal Trade Commission (the “Commission” or “FTC”), Bureau of Competition, and counsel for Plaintiff FTC in the above-captioned matter. I have personal knowledge of the facts set forth in this declaration. I submit this declaration in support of the FTC’s Motion for Preliminary Injunction.
2. Attached to this declaration and identified in the index below as **Doc. Nos. 2-74, 217** are true and correct copies of documents produced by and designated confidential by Defendant Tapestry, Inc. (“Tapestry”).
3. Attached to this declaration and identified in the index below as **Doc. Nos. 1, 75-145** are true and correct copies of documents produced by and designated confidential by Defendant Capri Holdings Limited (“Capri”).
4. Attached to this declaration and identified in the index below as **Doc. No. 146**

- (PX3120 ([REDACTED])) is a true and correct copy of a document produced by [REDACTED] and designated confidential by [REDACTED].
5. Attached to this declaration and identified in the index below as **Doc. No. 147** (PX3150 ([REDACTED])) is a true and correct copy of a document produced by and designated confidential by [REDACTED].
6. Attached to this declaration and identified in the index below as **Docs. No. 148-149** (PX3163 ([REDACTED]); PX3175 ([REDACTED])) are true and correct copies of documents produced by and designated confidential by [REDACTED].
7. Attached to this declaration and identified in the index below as **Doc. No. 150** (PX3201 ([REDACTED])) is a true and correct copy of a document produced by and designated confidential by [REDACTED].
8. Attached to this declaration and identified in the index below as **Doc. No. 151** (PX3309 ([REDACTED])) is a true and correct copy of a document produced by and designated confidential by [REDACTED].
9. Attached to this declaration and identified in the index below as **Doc. No. 152** (PX4000) is a true and correct copy of the declaration of [REDACTED] (May 23, 2024) designated confidential by [REDACTED].
10. Attached to this declaration and identified in the index below as **Doc. No. 153** (PX4002) is a true and correct copy of the declaration of [REDACTED] (July 8, 2024) designated confidential by [REDACTED].
11. Attached to this declaration and identified in the index below as **Doc. No. 154** (PX5000) is a true and correct copy of the transcript of the Investigational Hearing of

John Idol as a corporate representative of Capri (Feb. 29, 2024) designated confidential by Capri.

12. Attached to this declaration and identified in the index below as **Doc. No. 155 (PX5001)** is a true and correct copy of the transcript of the Investigational Hearing of John Idol in his personal capacity (Mar. 6, 2024) designated confidential by Capri.
13. Attached to this declaration and identified in the index below as **Doc. No. 156 (PX5002)** is a true and correct copy of the transcript of the Investigational Hearing of Joanne Crevoiserat as a corporate representative of Tapestry (Mar. 7, 2024) designated confidential by Tapestry.
14. Attached to this declaration and identified in the index below as **Doc. No. 157 (PX5003)** is a true and correct copy of the transcript of the Investigational Hearing of Todd Kahn as a corporate representative of Coach and Tapestry (Mar. 5, 2024) designated confidential by Tapestry.
15. Attached to this declaration and identified in the index below as **Doc. No. 158 (PX5006)** is a true and correct copy of the transcript of the deposition of Todd Kahn (June 14, 2024) designated confidential by Tapestry.
16. Attached to this declaration and identified in the index below as **Doc. No. 159 (PX5008)** is a true and correct copy of the transcript of the deposition of Leigh Levine (June 19, 2024) designated confidential by Tapestry.
17. Attached to this declaration and identified in the index below as **Doc. No. 160 (PX5009)** is a true and correct copy of the transcript of the deposition of Anne Walsh (June 20, 2024) designated confidential by Capri.
18. Attached to this declaration and identified in the index below as **Doc. No. 161**

- (**PX5010**) is a true and correct copy of the transcript of the deposition of Ashley Rocha-Rinere (June 21, 2024) designated confidential by Tapestry.
19. Attached to this declaration and identified in the index below as **Doc. No. 162**
(**PX5011**) is a true and correct copy of the transcript of the deposition of Michael Kors (June 21, 2024) designated confidential by Capri.
20. Attached to this declaration and identified in the index below as **Doc. No. 163**
(**PX5017**) is a true and correct copy of the transcript of the deposition of Andrea Bozeman (July 2, 2024) designated confidential by Capri.
21. Attached to this declaration and identified in the index below as **Doc. No. 164**
(**PX5019**) is a true and correct copy of the transcript of the deposition of Joanne Crevoiserat (July 2, 2024) designated confidential by Tapestry.
22. Attached to this declaration and identified in the index below as **Doc. No. 165**
(**PX5020**) is a true and correct copy of the transcript of the deposition of Pamela Lifford (July 10, 2024) designated confidential by Tapestry.
23. Attached to this declaration and identified in the index below as **Doc. No. 166**
(**PX5021**) is a true and correct copy of the transcript of the deposition of John Idol (July 10, 2024) designated confidential by Capri.
24. Attached to this declaration and identified in the index below as **Doc. No. 167**
(**PX5022**) is a true and correct copy of the transcript of the deposition of Cedric Wilmotte (July 10, 2024) designated confidential by Capri.
25. Attached to this declaration and identified in the index below as **Doc. No. 168**
(**PX5024**) is a true and correct copy of the transcript of the deposition of Scott Roe (July 11, 2024) designated confidential by Tapestry.

26. Attached to this declaration and identified in the index below as **Doc. No. 169 (PX5025)** is a true and correct copy of the transcript of the deposition of Rae Tao (July 12, 2024) designated confidential by Tapestry.
27. Attached to this declaration and identified in the index below as **Doc. No. 170 (PX5026)** is a true and correct copy of the transcript of the deposition of [REDACTED] [REDACTED] (July 16, 2024) designated confidential by [REDACTED].
28. Attached to this declaration and identified in the index below as **Doc. No. 171 (PX5027)** is a true and correct copy of the transcript of the deposition of Liz Harris (July 16, 2024) designated confidential by Tapestry.
29. Attached to this declaration and identified in the index below as **Doc. No. 172 (PX5029)** is a true and correct copy of the transcript of the deposition of [REDACTED] [REDACTED] (July 17, 2024) designated confidential by [REDACTED].
30. Attached to this declaration and identified in the index below as **Doc. No. 173 (PX5032)** is a true and correct copy of the transcript of the deposition of [REDACTED] [REDACTED] (July 17, 2024) designated confidential by [REDACTED] [REDACTED].
31. Attached to this declaration and identified in the index below as **Doc. No. 174 (PX5033)** is a true and correct copy of the transcript of the deposition of Philippa Newman Chapuis (July 18, 2024) designated confidential by Capri.
32. Attached to this declaration and identified in the index below as **Doc. No. 175 (PX5034)** is a true and correct copy of the transcript of the deposition of Andrea Resnick (July 19, 2024) designated confidential by Tapestry.
33. Attached to this declaration and identified in the index below as **Doc. No. 176**

- (PX5035) is a true and correct copy of the transcript of the deposition of Liz Fraser (July 18 2024) designated confidential by Tapestry.
34. Attached to this declaration and identified in the index below as **Doc. No. 177** (PX5036) is a true and correct copy of the transcript of the deposition of Peter Charles (July 18, 2024) designated confidential by Tapestry.
35. Attached to this declaration and identified in the index below as **Doc. No. 178** (PX5037) is a true and correct copy of the transcript of the deposition of [REDACTED] [REDACTED] (July 19, 2024) designated confidential by [REDACTED].
36. Attached to this declaration and identified in the index below as **Doc. No. 179** (PX5038) is a true and correct copy of the transcript of the deposition of [REDACTED] [REDACTED] (July 19, 2024) designated confidential by [REDACTED] [REDACTED].
37. Attached to this declaration and identified in the index below as **Doc. No. 180** (PX5040) is a true and correct copy of the transcript of the deposition of Sloan Tichner (July 22, 2024) designated confidential by Steve Madden, Ltd. The publicly filed version of this exhibit will appear in redacted form, with the redactions designated by Steve Madden, Ltd.
38. Attached to this declaration and identified in the index below as **Doc. No. 181** (PX5041) is a true and correct copy of the transcript of the deposition of Tim Ryan (July 22 2024) designated confidential by Tapestry.
39. Attached to this declaration and identified in the index below as **Doc. No. 182** (PX5044) is a true and correct copy of the transcript of the deposition of Laura Parsons (July 17, 2024) designated confidential by Capri.

40. Attached to this declaration and identified in the index below as **Doc. No. 183 (PX5046)** is a true and correct copy of the transcript of the deposition of [REDACTED] [REDACTED] (July 24, 2024) designated confidential by [REDACTED].
41. Attached to this declaration and identified in the index below as **Doc. No. 184 (PX5048)** is a true and correct copy of the transcript of the deposition of Christina Colone (July 25, 2024) designated confidential by Tapestry.
42. Attached to this declaration and identified in the index below as **Doc. No. 185 (PX5058)** is a true and correct copy of the transcript of the deposition of [REDACTED] [REDACTED] (Aug. 5, 2024) designated confidential by [REDACTED].
43. Attached to this declaration and identified in the index below as **Doc. No. 186 (PX6000)** is a true and correct copy of the Initial Expert Report of Dr. Loren K Smith (July 26, 2024).
44. Attached to this declaration and identified in the index as **Doc. No. 187 (PX7029)** is a true and correct copy of a Fair Disclosure Wire transcript entitled *Q1 2023 Tapestry Inc Earnings Call – Final* (Nov. 10, 2022).
45. Attached to this declaration and identified in the index as **Doc. No. 188 (PX7030)** is a true and correct copy of a Fair Disclosure Wire transcript entitled *Q1 2024 Tapestry Inc Earnings Call – Final* (Nov. 9, 2023).
46. Attached to this declaration and identified in the index as **Doc. No. 189 (PX7045)** is a true and correct copy of a Fair Disclosure Wire transcript entitled *Q3 2023 Tapestry Inc Earnings Call – Final* (May 11, 2023).
47. Attached to this declaration and identified in the index as **Doc. No. 190 (PX7053)** is a true and correct copy of a Fair Disclosure Wire transcript entitled *Q4 2022 Tapestry*

- Inc Earnings Call – Final* (Aug. 18, 2022).
48. Attached to this declaration and identified in the index as **Doc. No. 191 (PX7054)** is a true and correct copy of a Fair Disclosure Wire transcript entitled *Q4 2023 Tapestry Inc Earnings Call – Final* (Aug. 17, 2023).
 49. Attached to this declaration and identified in the index as **Doc. No. 192 (PX7055)** is a true and correct copy of a Fair Disclosure Wire transcript entitled *Tapestry Inc to Acquire Capri Holdings Ltd – Final* (Aug. 10, 2023).
 50. Attached to this declaration and identified in the index as **Doc. No. 193 (PX7060)** is a true and correct copy of a press release titled *Coach, Inc. to Acquire Kate Spade & Company for \$18.50 Per Share in Cash*, located at <https://tapestry.gcs-web.com/news-releases/news-release-details/coach-inc-acquire-kate-spade-company-1850-share-cash> (May 8, 2017).
 51. Attached to this declaration and identified in the index as **Doc. No. 194 (PX7062)** is a true and correct copy of an article from the Wall Street Journal, by Carol Ryan, titled *Luxury Stores Are Bursting With Unsold Stuff*, (Dec. 8, 2023), located at <https://www.wsj.com/business/retail/luxury-outlets-sales-F43f3da0>.
 52. Attached to this declaration and identified in the index as **Doc. No. 195 (PX7075)** is a true and correct copy of a page from the website www.dior.com titled *FAQ Couture* and located at https://www.dior.com/en_us/fashion/faq-couture#dior-and-you-how-can-i-find-out-more-about-dior (Last visited Feb. 1, 2024).
 53. Attached to this declaration and identified in the index as **Doc. No. 196 (PX7083)** is a true and correct copy of a page from the website us.louisvuitton.com titled *Is there a Louis Vuitton outlet store?* and located at <https://us.louisvuitton.com/eng-us/louis->

vuitton-outlet (Last visited Feb. 1, 2024).

54. Attached to this declaration and identified in the index as **Doc. No. 197 (PX7093)** is a true and correct copy of a page from the website us.louisvuitton.com titled *Where are Louis Vuitton products manufactured?* located at <https://en.louisvuitton.com/en-nl/faq/products/eu-where-are-louis-vuitton-products-manufactured> (Last visited Feb. 1, 2024).
55. Attached to this declaration and identified in the index as **Doc. No. 197 (PX7095)** is a true and correct copy of the Annual Report for Capri Holdings, Limited (Form 10-K) (May 26, 2021).
56. Attached to this declaration and identified in the index as **Doc. No. 199 (PX7096)** is a true and correct copy of the Annual Report for Capri Holdings, Limited (Form 10-K) (June 1, 2022).
57. Attached to this declaration and identified in the index as **Doc. No. 200 (PX7097)** is a true and correct copy of the Annual Report for Capri Holdings, Limited (Form 10-K) (May 29, 2019).
58. Attached to this declaration and identified in the index as **Doc. No. 201 (PX7098)** is a true and correct copy of the Annual Report for Capri Holdings, Limited (Form 10-K) (May 31, 2023).
59. Attached to this declaration and identified in the index as **Doc. No. 202 (PX7104)** is a true and correct copy of the Annual Report for Tapestry, Inc., (Form 10-K) (Aug. 18, 2022).
60. Attached to this declaration and identified in the index as **Doc. No. 203 (PX7105)** is a true and correct copy of the Annual Report for Tapestry, Inc., (Form 10-K) (Aug. 17,

2023).

61. Attached to this declaration and identified in the index as **Doc. No. 204 (PX7109)** is a true and correct copy of a page from the website www.michaelkors.eu, titled *Shipping and Delivery (Europe)*, located at <https://www.michaelkors.eu/ie/en/info/shipping-terms.html> (Last visited Aug. 5, 2023).
62. Attached to this declaration and identified in the index as **Doc. No. 205 (PX7123)** is a true and correct copy of a press release titled *Coach, Inc. to Change Its Name to Tapestry, Inc.*, located at <https://tapestry.gcs-web.com/news-releases/news-release-details/coach-inc-change-its-name-tapestry-inc> (Oct. 11, 2017).
63. Attached to this declaration and identified in the index as **Doc. No. 206 (PX7138)** is a true and correct copy of a Fair Disclosure Wire transcript entitled *Q4 2022 Capri Holdings Ltd Earnings Call – Final* (June 1, 2022).
64. Attached to this declaration and identified in the index as **Doc. No. 207 (PX7139)** is a true and correct copy of an article from Bloomberg, by Jeanette Neuman, titled *Coach Tops Michael Kors In Handbag War – And Must Fix Its Rival*, (Aug. 11, 2023), located at <https://news.bloomberglaw.com/mergers-and-acquisitions/coach-tops-michael-kors-in-handbag-war-and-must-fix-its-rival>.
65. Attached to this declaration and identified in the index as **Doc. No. 208 (PX7168)** is a true and correct copy of a page from the website www.michaelkors.com titled *Shipping Terms*, located at <https://www.michaelkors.com/info/shipping-terms.html> (Last visited Mar. 5, 2024).
66. Attached to this declaration and identified in the index as **Doc. No. 209 (PX7182)** is a true and correct copy of a page from the website rebeccaminkoff.com, titled *About*

- Rebecca Minkoff*, located at <https://www.rebeccaminkoff.com/pages/about> (Last visited Mar. 27, 2024).
67. Attached to this declaration and identified in the index as **Doc. No. 210 (PX7187)** is a true and correct copy of a page from the website simone.co.kr titled *Simone Way*, located at <https://www.simone.co.kr/eng/index.php?pCode=way> (Last visited Mar. 27, 2024).
68. Attached to this declaration and identified in the index as **Doc. No. 211 (PX7197)** is a true and correct copy of a page from the website www.loewe.com, titled *Loewe, Our commitment to Craft*, located at <https://www.loewe.com/usa/en/craft/craft-commitment.html> (Last visited Aug. 5, 2024).
69. Attached to this declaration and identified in the index as **Doc. No. 212 (PX7234)** is a true and correct copy of an article from WWD titled *Michael Kors Pre-Loved, a New Resale Marketplace, Launches Today* (Aug. 26, 2022).
70. Attached to this declaration and identified in the index as **Doc. No. 213 (PX7260)** is a true and correct copy of a page from the website www.toryburch.com, titled *Tory Burch, Semi-Annual Sale*, located at <https://www.toryburch.com/en-us/announcements/sas-disclaimer/> (Last visited July 3, 2024).
71. Attached to this declaration and identified in the index as **Doc. No. 214 (PX7275)** is a true and correct copy of a page from the website www.hermes.com titled *Products-Availability FAQ Hermes USA* located at <https://www.hermes.com/us/en/faq/products-us/availability/> (Last visited Apr. 9, 2024).
72. Attached to this declaration and identified in the index as **Doc. No. 215 (PX7284)** is a

true and correct copy of a page from the website www.coach.com, titled *Shipping Details & Fees*, located at <https://www.coach.com/support/shipping-details> (Last visited June 19, 2024).

73. Attached to this declaration and identified in the index as **Doc. No. 216 (PX7285)** is a true and correct copy of a page from the website uk.coach.com titled *Shipping Details & Fees (United Kingdom)*, located at <https://uk.coach.com/support/shipping-details>. (Last visited June 19, 2024).

EXHIBIT INDEX

Doc. No.	PX No.	Description	Source
1	PX0006	[REDACTED]	Capri
2	PX0010	[REDACTED]	Tapestry
3	PX0026	[REDACTED]	Tapestry
4	PX1032	[REDACTED]	Tapestry
5	PX1067	[REDACTED]	Tapestry
6	PX1069	[REDACTED]	Tapestry
7	PX1074	[REDACTED]	Tapestry
8	PX1078	[REDACTED]	Tapestry
9	PX1085	[REDACTED]	Tapestry
10	PX1088	[REDACTED]	Tapestry
11	PX1092	[REDACTED]	Tapestry
12	PX1096	[REDACTED]	Tapestry

Doc. No.	PX No.	Description	Source
13	PX1105	[REDACTED]	Tapestry
14	PX1109	[REDACTED]	Tapestry
15	PX1118	[REDACTED]	Tapestry
16	PX1121	[REDACTED]	Tapestry
17	PX1124	[REDACTED]	Tapestry
18	PX1129	[REDACTED]	Tapestry
19	PX1133	[REDACTED]	Tapestry
20	PX1144	[REDACTED]	Tapestry
21	PX1152	[REDACTED]	Tapestry
22	PX1157	[REDACTED]	Tapestry
23	PX1160	[REDACTED]	Tapestry
24	PX1175	[REDACTED]	Tapestry
25	PX1186	[REDACTED]	Tapestry

Doc. No.	PX No.	Description	Source
26	PX1200	[REDACTED]	Tapestry
27	PX1201	[REDACTED]	Tapestry
28	PX1216	[REDACTED]	Tapestry
29	PX1219	[REDACTED]	Tapestry
30	PX1223	[REDACTED]	Tapestry
31	PX1224	[REDACTED]	Tapestry
32	PX1244	[REDACTED]	Tapestry
33	PX1250	[REDACTED]	Tapestry
34	PX1255	[REDACTED]	Tapestry
35	PX1262	[REDACTED]	Tapestry
36	PX1265	[REDACTED]	Tapestry
37	PX1278	[REDACTED]	Tapestry

Doc. No.	PX No.	Description	Source
38	PX1296	[REDACTED]	Tapestry
39	PX1306	[REDACTED]	Tapestry
40	PX1310	[REDACTED]	Tapestry
41	PX1311	[REDACTED]	Tapestry
42	PX1316	[REDACTED]	Tapestry
43	PX1327	[REDACTED]	Tapestry
44	PX1338	[REDACTED]	Tapestry
45	PX1374	[REDACTED]	Tapestry
46	PX1379	[REDACTED]	Tapestry
47	PX1387	[REDACTED]	Tapestry
48	PX1418	[REDACTED]	Tapestry
49	PX1427	[REDACTED]	Tapestry
50	PX1431	[REDACTED]	Tapestry

Doc. No.	PX No.	Description	Source
51	PX1485	[REDACTED]	Tapestry
52	PX1503	[REDACTED]	Tapestry
53	PX1507	[REDACTED]	Tapestry
54	PX1536	[REDACTED]	Tapestry
55	PX1635	[REDACTED]	Tapestry
56	PX1703	[REDACTED]	Tapestry
57	PX1704	[REDACTED]	Tapestry
58	PX1706	[REDACTED]	Tapestry
59	PX1715	[REDACTED]	Tapestry
60	PX1723	[REDACTED]	Tapestry
61	PX1726	[REDACTED]	Tapestry
62	PX1727	[REDACTED]	Tapestry
63	PX1730	[REDACTED]	Tapestry
64	PX1731	[REDACTED]	Tapestry
65	PX1737	[REDACTED]	Tapestry

Doc. No.	PX No.	Description	Source
66	PX1765	[REDACTED]	Tapestry
67	PX1767	[REDACTED]	Tapestry
68	PX1783	[REDACTED]	Tapestry
69	PX1788	[REDACTED]	Tapestry
70	PX1812	[REDACTED]	Tapestry
71	PX1862	[REDACTED]	Tapestry
72	PX1924	[REDACTED]	Tapestry
73	PX1939	[REDACTED]	Tapestry
74	PX1970	[REDACTED]	Tapestry
75	PX2010	[REDACTED]	Capri
76	PX2012	[REDACTED]	Capri
77	PX2014	[REDACTED]	Capri
78	PX2030	[REDACTED]	Capri

Doc. No.	PX No.	Description	Source
79	PX2034	[REDACTED]	Capri
80	PX2035	[REDACTED]	Capri
81	PX2036	[REDACTED]	Capri
82	PX2040	[REDACTED]	Capri
83	PX2043	[REDACTED]	Capri
84	PX2047	[REDACTED]	Capri
85	PX2050	[REDACTED]	Capri
86	PX2052	[REDACTED]	Capri
87	PX2058	[REDACTED]	Capri
88	PX2061	[REDACTED]	Capri
89	PX2066	[REDACTED]	Capri

Doc. No.	PX No.	Description	Source
90	PX2068	[REDACTED]	Capri
91	PX2070	[REDACTED]	Capri
92	PX2072	[REDACTED]	Capri
93	PX2075	[REDACTED]	Capri
94	PX2085	[REDACTED]	Capri
95	PX2091	[REDACTED]	Capri
96	PX2092	[REDACTED]	Capri
97	PX2097	[REDACTED]	Capri
98	PX2098	[REDACTED]	Capri
99	PX2100	[REDACTED]	Capri
100	PX2101	[REDACTED]	Capri
101	PX2103	[REDACTED]	Capri
102	PX2105	[REDACTED]	Capri
103	PX2108	[REDACTED]	Capri

Doc. No.	PX No.	Description	Source
104	PX2113	[REDACTED]	Capri
105	PX2117	[REDACTED]	Capri
106	PX2119	[REDACTED]	Capri
107	PX2124	[REDACTED]	Capri
108	PX2128	[REDACTED]	Capri
109	PX2132	[REDACTED]	Capri
110	PX2158	[REDACTED]	Capri
111	PX2159	[REDACTED]	Capri
112	PX2183	[REDACTED]	Capri
113	PX2197	[REDACTED]	Capri
114	PX2213	[REDACTED]	Capri
115	PX2214	[REDACTED]	Capri

Doc. No.	PX No.	Description	Source
116	PX2224	[REDACTED]	Capri
117	PX2240	[REDACTED]	Capri
118	PX2242	[REDACTED]	Capri
119	PX2243	[REDACTED]	Capri
120	PX2254	[REDACTED]	Capri
121	PX2257	[REDACTED]	Capri
122	PX2271	[REDACTED]	Capri
123	PX2294	[REDACTED]	Capri
124	PX2299	[REDACTED]	Capri
125	PX2304	[REDACTED]	Capri
126	PX2308	[REDACTED]	Capri
127	PX2310	[REDACTED]	Capri
128	PX2346	[REDACTED]	Capri
129	PX2350	[REDACTED]	Capri
130	PX2379	[REDACTED]	Capri
131	PX2394	[REDACTED]	Capri

Doc. No.	PX No.	Description	Source
132	PX2408	[REDACTED]	Capri
133	PX2415	[REDACTED]	Capri
134	PX2419	[REDACTED]	Capri
135	PX2423	[REDACTED]	Capri
136	PX2435	[REDACTED]	Capri
137	PX2436	[REDACTED]	Capri
138	PX2439	[REDACTED]	Capri
139	PX2561	[REDACTED]	Capri
140	PX2622	[REDACTED]	Capri
141	PX2674	[REDACTED]	Capri
142	PX2680	[REDACTED]	Capri
143	PX2725	[REDACTED]	Capri

Doc. No.	PX No.	Description	Source
144	PX2727	[REDACTED]	Capri
145	PX2753	[REDACTED]	Capri
146	PX3120	[REDACTED]	[REDACTED]
147	PX3150	[REDACTED]	[REDACTED]
148	PX3163	[REDACTED]	[REDACTED]
149	PX3175	[REDACTED]	[REDACTED]
150	PX3201	[REDACTED]	[REDACTED]
151	PX3309	[REDACTED]	[REDACTED]
152	PX4000	Declaration of [REDACTED] (May 23, 2024)	[REDACTED]
153	PX4002	Declaration of [REDACTED] (Jul. 8, 2024)	
154	PX5000	IH Transcript of John Idol [Corporate] (Feb. 29, 2024)	Capri
155	PX5001	IH Transcript of John Idol [Personal] (Mar. 6, 2024)	Capri
156	PX5002	IH Transcript of Joanne Crevoiserat [Corporate] (Mar. 7, 2024)	Tapestry
157	PX5003	IH Transcript of Todd Kahn [Corporate] (Mar. 5, 2024)	Coach/Tapestry
158	PX5006	Deposition Transcript of Todd Kahn (June 14, 2024)	Tapestry
159	PX5008	Deposition Transcript of Leigh Levine (June 19, 2024)	Tapestry
160	PX5009	Deposition Transcript of Anne Walsh (June 20, 2024)	Capri
161	PX5010	Deposition Transcript of Ashley Rocha-Rinere (June 21, 2024)	Tapestry
162	PX5011	Deposition Transcript of Michael Kors (June 21, 2024)	Capri
163	PX5017	Deposition Transcript of Andrea Bozeman (July 2, 2024)	Capri
164	PX5019	Deposition Transcript of Joanne Crevoiserat (July 2, 2024)	Tapestry

Doc. No.	PX No.	Description	Source
165	PX5020	Deposition Transcript of Pamela Lifford (July 10, 2024)	Tapestry
166	PX5021	Deposition Transcript of John Idol (July 10, 2024)	Capri
167	PX5022	Deposition Transcript of Cedric Wilmotte (July 10, 2024)	Capri
168	PX5024	Deposition Transcript of Scott Roe (Tapestry) (July 11, 2024)	Tapestry
169	PX5025	Deposition Transcript of Rae Tao (Tapestry) (July 12, 2024)	Tapestry
170	PX5026	Deposition Transcript of [REDACTED] (July 16, 2024)	[REDACTED]
171	PX5027	Deposition Transcript of Liz Harris (July 16, 2024)	Tapestry
172	PX5029	Deposition Transcript of [REDACTED] (Jul. 17, 2024)	[REDACTED]
173	PX5032	Deposition Transcript of [REDACTED] (July 17, 2024)	[REDACTED]
174	PX5033	Deposition Transcript of Philippa Newman Chapuis (July 18, 2024)	Capri
175	PX5034	Deposition Transcript of Andrea Resnick (July 19, 2024)	Tapestry
176	PX5035	Deposition Transcript of Liz Fraser (July 18, 2024)	Tapestry
177	PX5036	Deposition Transcript of Peter Charles (July 18, 2024)	Tapestry
178	PX5037	Deposition Transcript of [REDACTED] (July 19, 2024)	[REDACTED]
179	PX5038	Deposition Transcript of [REDACTED] (July 19, 2024)	[REDACTED]
180	PX5040	Deposition Transcript of Sloan Tichner (July 22, 2024)	Steve Madden
181	PX5041	Deposition Transcript of Tim Ryan (July 22, 2024)	Tapestry
182	PX5044	Deposition Transcript of Laura Parsons (July 17, 2024)	Capri
183	PX5046	Deposition Transcript of [REDACTED] (July 24, 2024)	[REDACTED]
184	PX5048	Deposition Transcript of Christina Colone (July 25, 2024)	Tapestry
185	PX5058	Deposition of [REDACTED] (Aug. 5, 2024)	[REDACTED]
186	PX6000	Initial Expert Report of Dr. Loren K Smith (Jul. 26, 2024)	Plaintiff
187	PX7029	Q1 2023 Tapestry Inc Earnings Call – Final (Nov. 10, 2022)	Publicly Available
188	PX7030	Q1 2024 Tapestry Inc Earnings Call – Final (Nov. 9, 2023)	Publicly Available
189	PX7045	Q3 2023 Tapestry Inc Earnings Call – Final (May 11, 2023)	Publicly Available

Doc. No.	PX No.	Description	Source
190	PX7053	Q4 2022 Tapestry Inc Earnings Call – Final (Aug. 18, 2022)	Publicly Available
191	PX7054	Q4 2023 Tapestry Inc Earnings Call – Final (Aug. 17, 2023)	Publicly Available
192	PX7055	Tapestry Inc to Acquire Capri Holdings Ltd – Final (Aug. 10, 2023)	Publicly Available
193	PX7060	Press Release: <i>Coach, Inc. to Acquire Kate Spade & Company for \$18.50 Per Share in Cash</i> (May 8, 2017)	Publicly Available
194	PX7062	Article: Carol Ryan, <i>Luxury Stores Are Bursting With Unsold Stuff</i> , Wall Street Journal (Dec. 8, 2023).	Publicly Available
195	PX7075	Website: Dior, <i>FAQ Couture</i> , https://www.dior.com/en_us/fashion/faq-couture#dior-and-you-how-can-i-find-out-more-about-dior (Last visited Feb. 1, 2024)	Publicly Available
196	PX7083	Website: Louis Vuitton, <i>Is there a Louis Vuitton outlet store?</i> , https://us.louisvuitton.com/eng-us/louis-vuitton-outlet (Last visited Feb. 1, 2024).	Publicly Available
197	PX7093	Website: Louis Vuitton, <i>Where are Louis Vuitton products manufactured?</i> , https://en.louisvuitton.com/eng-nl/faq/products/eu-where-are-louis-vuitton-products-manufactured (Last visited Feb. 1, 2024).	Publicly Available
198	PX7095	Capri 2021 10-K	Publicly Available
199	PX7096	Capri 2022 10-K	Publicly Available
200	PX7097	Capri 2019 10-K	Publicly Available
201	PX7098	Capri 2023 10-K	Publicly Available
202	PX7104	Tapestry 2022 10-K	Publicly Available
203	PX7105	Tapestry 2023 10-K	Publicly Available
204	PX7109	Website: Michael Kors, <i>Shipping and Delivery (Europe)</i> , located at https://www.michaelkors.eu/ie/en/info/shipping-terms.html (Last visited Aug. 5, 2023).	Publicly Available
205	PX7123	Press Release: <i>Coach, Inc. to Change Its Name to Tapestry, Inc.</i> (Oct. 11, 2017).	Publicly Available
206	PX7138	Earnings Call Transcript: <i>Q4 2022 Capri Holdings Ltd Earnings Call – Final</i> (June 1, 2022).	Publicly Available
207	PX7139	Article: Jeanette Neuman, Bloomberg, <i>Coach Tops Michael Kors In Handbag War – And Must Fix Its Rival</i> , (Aug. 11, 2023)	Publicly Available
208	PX7168	Website: Michael Kors, <i>Shipping Terms</i> , https://www.michaelkors.com/info/shipping-terms.html (Last visited Mar. 5, 2024).	Publicly Available

Doc. No.	PX No.	Description	Source
209	PX7182	Website: Rebecca Minkoff, <i>About Rebecca Minkoff</i> , https://www.rebeccaminkoff.com/pages/about (Last visited Mar. 27, 2024).	Publicly Available
210	PX7187	Website: Simone, <i>Simone Way</i> , https://www.simone.co.kr/eng/index.php?pCode=way (Last visited Mar. 27, 2024).	Publicly Available
211	PX7197	Website: Loewe, <i>Loewe, Our commitment to Craft</i> , https://www.loewe.com/usa/en/craft/craft-commitment.html (Last visited Aug. 5, 2024).	Publicly Available
212	PX7234	Article: WWD, <i>Michael Kors Pre-Loved, a New Resale Marketplace, Launches Today</i> (Aug. 26, 2022).	Publicly Available
213	PX7260	Website: Tory Burch, <i>Tory Burch, Semi-Annual Sale</i> , https://www.toryburch.com/en-us/announcements/sas-disclaimer/ (Last visited July 3, 2024).	Publicly Available
214	PX7275	Website: Hermes, <i>Products-Availability FAQ Hermes USA</i> , https://www.hermes.com/us/en/faq/products-us/availability/ (Last visited Apr. 9, 2024).	Publicly Available
215	PX7284	Website: Coach, <i>Shipping Details & Fees</i> , https://www.coach.com/support/shipping-details (Last visited June 19, 2024).	Publicly Available
216	PX7285	Website: Coach UK, <i>Shipping Details & Fees (United Kingdom)</i> , https://uk.coach.com/support/shipping-details (Last visited Jun. 19, 2024).	Publicly Available
217	PX8110	[REDACTED]	Tapestry

Pursuant to 28 U.S.C. § 1746, I state under penalty of perjury that the foregoing is true and correct.

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Dated: August 6, 2024

Respectfully submitted,

S/ Abby L. Dennis

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